**Implementation Workshop write-up of Scenario/Case study breakout group session**

The group was presented with a scenario that consisted of a nutrient TMDL and set of current and projected landuse changes. The group was asked to develop a strategy to reduce current nutrient loads to be consistent with the TMDL and also maintain that load based on the projected landuse changes. (Appendix F of the TMDL Implementation Guidance works through a similar case study).

- Several approaches were explored that would result in reduced loadings and several possibilities were discussed that could be used to maintain these loads
- The discussion on reducing loads focused on the following approaches
    - Use of ENR upgrades at major WWTPs
    - Possible consolidation of minor WWTPs
    - On-site septic system management
    - Potential use of spray irrigation to reduce loads – if applicable
- Other topics raised during this discussion include
    - The perception that allocations have 'value' (i.e., monetary or political value associated with economic development opportunities associated with treatment plant capacity)
    - Who controls the allocation associated with the TMDL, can it be re-allocated and who is in control of the process? [Editor's Note: Changes in allocations must be executed through a public process managed by the State].
- The discussion on maintaining loads focused on the following topics
    - What is acceptable monitoring to document progress?
    - Who is in control of a point source allocation if the point source stops discharging?
    - Can reductions to loadings be reserved and sold as offsets?
    - Possible use of incentives to encourage small scale treatment facilities that reduce nutrient loads as compared to septic systems.
- During both conversations the following issues were raised
    - Difficulty of local governments to implement load reduction actions due to policy issues and undefined timeframe for achieving load reductions
    - Lack of understanding of how TMDLs and Tributary Strategies interrelate